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**From:** Nesci, Kimberly [Nesci.Kimberly@epa.gov]  
**Sent:** 3/9/2021 10:27:55 PM  
**To:** Nguyen, Thuy [Nguyen.Thuy@epa.gov]  
**Subject:** RE: Tonight's PFAS meeting

Sorry I missed this one – thanks SO much, Thuy.

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**From:** Nguyen, Thuy <Nguyen.Thuy@epa.gov>  
**Sent:** Tuesday, March 9, 2021 5:13 PM  
**To:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Subject:** FW: Tonight's PFAS meeting

FYI

Let me know if you have question

We ran out of time and did not cover “Any other updates”

Thuy

**NOTES from Meeting March 09, 2021**

**Updates from OPPT**

Tristan B: Low MW and some MW polymers. Treated with FI gas. Uncontrolled reaction. Polymer chain may be broken and form low MW PFAS

Tracy W: TSCA – Partially fluorinated surface of containers. Not lot of partially fluorinated substances on TSCA list. May be considered new chemicals. May not be subjected to section 5, and include to exemption in the Reg  
Shorter chain PFAS may be formed as by-products. Shorter chain may not impact performance of containers. Have been talking to OGC

Chris: Nothing further from Chris (OGC)

Ed M: Did fluorination change the make-up of containers.

Tracy W: Reaction happened of the surface. Couple micron deep. Just polyethylene on the surface get changed during the fluorination. It is not likely that the reaction is deeper than the surface. PFAS found maybe by-products

Yaorong Q: Did Ex. 5 Deliberative Process (DP) talk about other by-products other than PFAS found?

Tracy and Tristan: By-products other than PFAS may be formed but not intentionally.

Rick K: Would same thing like this happen with other fluorination companies?

Tracy W: Probably.

Mark: Treatment is one way, but can use possibly can also create PFAS

Tracy W: manufacturing HDPE may be generating low MW species. When fluorinate, the low MW species can be formed into PFAS. Recycling may have shorter MW species

Mark: Does Ex. 5 Deliberative Process (DP) disagree with our findings that fluorinate created PFAS as by-products

Tracy W: Not really

Tristan: It's plausible that the fluorination forms PFAS by products

Tracy W: C-F bonds in their spectra, not identified

Next Steps- work with OECA on the meeting with Ex. 5 Deliberative Process (DP) chemists

**Lab Update:**

Yaorong – final review of Anvil products

Test surfactant test on containers

Try to optimize method

Thuy – talk about meeting w/MA Lab director. They will be sending split samples with ACB (6 formulations). ACB will be sharing with MA our list of purchased containers

**OECA update:**

Diana - What is our plan? Is there a process underway for the identified products.

6A2- pesticide producers to test their products? Prepare for follow plan for Clarke and Ex. 3 Deliberative Process (DP) Come up with Q&A for companies to share info regarding PFAS in their products

Catherine – update with PEER and inerts. Meet w/PEER last week to tell them how we evaluate inerts. Ask them to share data. PEER expressed concern PFAS in whole universe related to container. What is definition of PFAS so everyone is taking about the same

Marietta - 6A2 does not require testing. Only require that if company knows of adverse effect, they are required to submit to us – voluntary

Erin – 6A2 is not enforceable

Royan – What is someone knows of adverse effect and not report?

Erin – Yes, we can enforce if adverse effect was not reported

Royan – our messaging is “no PFAS in our inerts”.

Royan - Anything on schedule with upcoming outreach

Ed M – No road show in next few weeks

Madison - Tala/representatives will be coming to these meetings going forward

Royan – OECA has authority to collect samples, but need strategy based on directions the needle is pointing – may be test same product that PEER is testing.

Diane - Are we going to have companies doing testing and report back to us.

Ed M - Look at PEER article. Find out what other fluorinators exist

Marietta- not comfortable doing anything else based on PEER testing. PEER lab has contamination issue

Thuy – Do you want us to purchase products that PEER test if not on the MA list

Royan - Get info from Trade Association of what other companies used fluorinated containers.

? - Under subpoena authority we can enforce and collect information about what’s going on

Royan – Find out what MA is testing and if the products overlap with PEER’s testing

Catherine - Have one FIOA in house for OPP

**From:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>

**Sent:** Tuesday, March 9, 2021 12:03 PM

**To:** Aubee, Catherine <Aubee.Catherine@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Dennis, Allison <Dennis.Allison@epa.gov>

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**Subject:** Tonight's PFAS meeting

All,

Just a brief reminder that I will not be able to make today's 4:00 meeting, so topic leads are indicated below. I added a new agenda item for OECA (Diana lead, or her colleague). Could folks please document and reply to all with any actions items following this afternoon's discussion.

Thank you!  
Kimberly

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Office of Chemical Safety and Pollution Prevention  
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**From:** Nesci, Kimberly

**Sent:** Tuesday, March 2, 2021 5:07 PM

**To:** Aubee, Catherine <[Aubee.Catherine@epa.gov](mailto:Aubee.Catherine@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Nguyen, Thuy <[Nguyen.Thuy@epa.gov](mailto:Nguyen.Thuy@epa.gov)>; Qian, Yaorong <[qian.yaorong@epa.gov](mailto:qian.yaorong@epa.gov)>; Teter, Royan <[Teter.Royan@epa.gov](mailto:Teter.Royan@epa.gov)>; Saenz, Diana <[Saenz.Diana@epa.gov](mailto:Saenz.Diana@epa.gov)>; Anderson, Neil <[Anderson.Neil@epa.gov](mailto:Anderson.Neil@epa.gov)>; Lara, Rhina <[Lara.Rhina@epa.gov](mailto:Lara.Rhina@epa.gov)>; Ozmen, Shamus <[Ozmen.Shamus@epa.gov](mailto:Ozmen.Shamus@epa.gov)>; Dennis, Allison <[Dennis.Allison@epa.gov](mailto:Dennis.Allison@epa.gov)>

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**Subject:** Recap/Action items OCSPP/OECA PFAS Check-In

Next week:

- Update from OPPT (Madison et al.)
- Lab updates (Thuy and Yaorong)
- OECA update (Diana Saenz)
- Any other updates (RD, OPP IO, meetings between chemists – what have we learned)
- (Note that I won't be here to lead the meeting, so I expect Madison and others to lead the OPPT update, Thuy or Yaorong to lead the lab updates. )

Action items from today:

- Shamus and Catheryn Aubee to work together on the language for an additional Q and A on what companies should do provided they find PFAS in their products
- OPP to consider options for formal notification of 6a2 obligations to companies
- Data report up to OPP IO (KN)
- OPPT and ACB lab to hold a technical discussion as needed
- OPP IO to talk to Clarke about the SSURO option for product returns, taking into consideration implications for possible future SSUROs
- OECA to set up a meeting between in 30 day chemists and OPPT/OPP chemists

- OPPT working through the old chem/new chem question, as well as options to obtain additional information. They will report out next week.

Thanks, all!

Kimberly Nesci, Director  
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